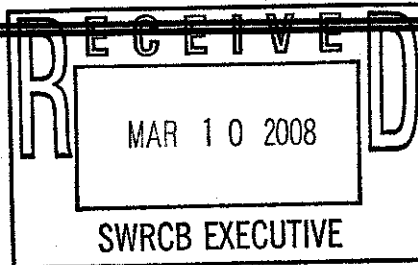




March 8, 2008

Jeanine Townsend  
Clerk to the Board, Executive Office  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-0100



**Board of Directors**

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Division 5

**General Manager**

Frank E. Royer

Dear Chair Doduc and Members of the Board:

The Camrosa Water District respectfully requests that the State Water Resources Control Board defer adoption of the draft Recycled Water Policy for California. While we had hoped that the revised Policy would help achieve the state's goal of removing barriers to the use of recycled water, we regrettably find ourselves faced with a draft Policy that, as written, does not accomplish this goal. For this reason, we urge the Board to defer adoption of the proposed Policy until the following issues are addressed:

1. The plan depends upon narrative toxicity objectives language as adopted by the Los Angeles RWQCB. The concentrations of chemical constituents that adversely affect any designated beneficial use are not specified. Without a more concrete goal we cannot measure our compliance in the present or plan for the future.
2. While a total Nitrogen limitation of 3 mg/L is attainable by a treatment plant that utilizes denitrification, such as our own, this limitation is lower than the drinking water limitation of up to 10 mg/L as N for nitrate alone and 1 mg/L as N for nitrite allowing for a total legal influent concentration of 11 mg/L before treatment. The form of the proposed "nutrient management practices" plan is vague and the responsible party to implement such a plan is not specified. If the purpose of the nutrient management plan is to protect the groundwater, then the user of the recycled water must participate as well to ensure success.
3. One of the largest sources of salt contamination in recycled water is the use of home regenerative water softeners. The SWRCB believes that local agencies have the ability to limit the use of these softeners. In fact, there are many legal obstacles to establishing this authority not to mention any actual ability to enforce such bans. In addition, there is absolutely no ability to retroactively ban home softeners which currently comprise the majority of our installed base.
4. We believe that an effective policy will take into consideration the marketability and cost effectiveness of recycled water. If the result of the additional limitations increases cost for the production and use of recycled water to the point that it meets or exceeds the costs of producing local groundwater or importing water, the use of the recycled water will diminish as there is little financial incentive for its use.

Camrosa urges that your Board address the issues outlined above before the Recycled Water Policy is adopted. We look forward to backing a policy that encourages recycled water producers, users, and regulators to work together in a way that will truly promote the use of recycled water while ensuring public safety and protecting the environment. Any plan must ensure that regulation remains economical for both users as well as producers. Thank you for your consideration.

Sincerely,

Frank E. Royer  
General Manager